

**UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT**

KSENIYA PETROVA,

Petitioner-Plaintiff,

v.

**U.S. DEPARTMENT OF HOMELAND
SECURITY; KRISTI NOEM**, Secretary of the
U.S. Department of Homeland Security, in her
official capacity; **THERESA MESSIER**,
Superintendent, Chittenden Regional Correctional
Facility, in her official capacity,

Respondents-Defendants.

Case No. 2:25-cv-00240-CR

FEDERAL RESPONDENT’S REQUEST FOR CONDITIONS OF RELEASE

On May 28, 2024, this Court granted Ms. Petrova’s request for bail under *Mapp v. Reno*, 241 F.3d 221 (2d Cir. 2001), and prohibited Immigration and Customs Enforcement (“ICE”), which encompasses Enforcement and Removal Operations (“ERO”) and Homeland Security Investigations (“HSI”), from detaining Ms. Petrova during the pendency of her ongoing removal proceedings under 8 U.S.C. § 1229a. ECF No. 70. At that hearing, this Court directed Federal Respondents to file a brief by May 30, 2025, identifying any condition of release that the Court should impose in Ms. Petrova’s case to mitigate her risk of non-appearance in removal proceedings. *Id.*

Federal Respondents request that the Court impose the standard conditions of release that apply to aliens who are subject to removal proceedings and who are released on their own recognizance. *See* Exhibit A, Form I-220A, Order of Release on Recognizance. Upon receipt of the Court-approved list of conditions, to confirm Petitioner’s receipt of and awareness of those

conditions and to harmonize the Court's order with the ongoing removal proceedings, ICE intends to serve Petitioner with a Form I-220A, Order of Release on Recognizance, that reflects both the Court's May 28, 2025, Order, as well as the list of approved conditions at Petitioner's next check-in with an ICE officer in or near Boston, Massachusetts.

Respectfully submitted,
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Dated: May 30, 2025

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